

Site St Louis Ordnance Plant
ID MO82100224645
Break 11 11

ST. LOUIS



CENTER

4333 Goodfellow Boulevard
St Louis, Missouri 63120
(314) 679-6200

November 1, 1999

Mr John Jurgensmeyer
Environmental Specialist
Hazardous Waste Enforcement Unit
Department of Natural Resources
Division of Environmental Quality
P O Box 176
Jefferson City, MO 65102-0176

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HAZARDOUS WASTE PROGRAM
MISSOURI DEPARTMENT OF
NATURAL RESOURCES

RE St Louis Job Corps Center, 4333 Goodfellow Boulevard, St Louis, Missouri

Dear Mr Jurgensmeyer,

In accordance with the terms of the Settlement Agreement, the following actions have been taken to correct those items as noted in your letter of October 7, 1999, received on October 12, 1999

1 Welding Shop as noted on page 12 of the audit report A determination of the waste material was conducted by Safety-Kleen Systems, Inc It was determined , following an analysis in February 1999 that the switches did not contain PCB's (Attach A) dated March 8, 1999 The material was 60% oil and 40% water See attachment 1 Ref No 2030926(consisting of two(2) pages, dated February 11, 1999 The material was removed, identified in attachment 1 and attachment B, from the center on August 9, 1999 (Attach 2) In the future, before suspected hazardous items are dismantled during construction projects, determination will be made by a qualified vendor as to potential danger before handling The center will use Safety- Kleen Systems, Inc, PSI or other authorized vendor to make the assessment , recommendation for handling and removal if necessary

2 Cement and Masonry area described on page 11 The drums have a label affixed to them that states, " Hazardous When Empty" and will be properly disposed of when empty The material is used to clean brick and cement projects in the respective trade areas The identified materials used



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are curing and sealing compounds. The material is manufactured by Conspec Marketing and Manufacturing Company, Inc. Kansas City, KS 66111. By contract, materials are removed from the on center storage area by Safety-Kleen every six(6) months or as requested by the center, for proper disposal. MSDS attached as No. 3 and 4 for the curing and sealing agents as discussed above.

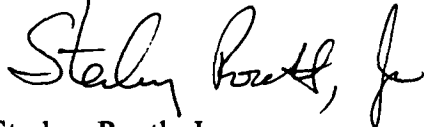
3 Maintenance and storage area, page 10. A careful review of the procedures used in the maintenance area determined that the proper procedures were being used in this area. There were two cans of penetrating oil with rust on the can but the material is still usable and does not leak. Any flammable /combustible materials are kept isolated and properly stored in the storage area. The materials shown in Fig. 3, paint cans, cleaning solvents and mixing container were all removed from the building following the walk-through on June 13, 1999. An inspection of the area on October 14, 1999 revealed that the combustibles are stored in a separate area (inspection conducted by the center safety officer, Perry Johnson, accompanied by Ron Moore, acting Manager of maintenance). The area was later viewed by the Center Director. Monthly inspections of the area will be conducted and results maintained by the center safety officer. An inventory of the materials was conducted October 15, 1999 (see attachment 5).

4 Storage can as described on page 12. The "can" used to store thinners and varnishes, in the paint shop area is not used as a satellite waste storage container. The container is used to clean paint brushes and painting tools and contains cleaning solvent (thinner). The container is used daily for this purpose and is emptied each Friday into the approved storage container in the waste storage area by the painting instructor. When the materials in the container are not being used, a lid will be placed on the container for protection against fumes and accidental spillage. Only one approved hazardous waste storage area is on the center and there is no need for a satellite storage.

5 Asbestos contaminated material. Should the center have cause to remove any asbestos, related to emergency repair or planned construction, regardless of type, the MDNR's Air Pollution Control Program department will be notified as prescribed in the regulations. The center contacts an approved vendor for proper removal as required for construction when such materials have been identified by the center personnel or contractor. The acting manager of the Maintenance Department, Mr. Ron Moore has had training in the identification, safe handling/ removal of small quantities in an emergency situation. The training was conducted by the State and Mr. Moore satisfactorily met the requirements. His training is kept up to date as required by the State of Missouri.

The center will make every effort to insure that all rules and regulations concerning the use and proper handling of hazardous material is strictly adhered to and followed. If you have any questions regarding this report please do hesitate to contact me at (314) 679-6265

Sincerely,

A handwritten signature in cursive script, appearing to read "Sterling Roath, Jr.", written in dark ink.

Sterling Roath, Jr
Center Director, St Louis Job Corps

- c Ms Kara Valentine, Attorney General's Office
- Mr Gerald A Isby-Davis, Project Manager, U S Department of Labor
- Ms Krista L McCracken, Project Manager, US Department of Labor
- Mr Rodney Salami, Project Manager, Environmental Engineering, DTS, Inc
- Mr Tom Deschule, VP Operations, MINACT, Inc
- Mr Mike Struck, St Louis Regional Office